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February 11, 2016

VIA E-MAIL, HAND DELIVERY

Jason Lichtman
Lieff Cabraser Heimann & Bernstein LLP
250 Hudson Street, 8th Floor
New York, New York 10013-1413

Re: *Dover, et al. v. British Airways, PLC*, No. 1:12-cv-5567

Dear Jason:

Pursuant to Judge Dearie's Individual Motion Practices Rule III. D. 1, attached hereto are copies of Defendant British Airways Plc ("BA") Memorandum in Further Support of BA's Motion for Summary Judgment and In Opposition to the Plaintiffs' Cross-Motion for Summary Judgment as to Liability ("Reply/Opp. Memorandum"), as well as copies of BA's Reply to Plaintiffs' Response to BA's Statement Pursuant to Local Rule 56.1 of Material Facts as to Which There is No Genuine Issue ("Reply 56.1"), BA's Response to Plaintiffs' Statement Pursuant to Local Rule 56.1 of Material Facts as to Which There is No Genuine Issue ("Opp. 56.1"), and the Declaration of Keara M. Gordon in support of BA's motion ("Gordon Declaration").

At this time, BA has provided all documents in unredacted form. Prior to filing the full set of briefing electronically pursuant to Judge Dearie's Individual Motion Practices Rule III D. 2 on February 25, 2016, BA will confer with plaintiffs, and, if necessary, file a motion for leave to file redacted versions of certain materials designated Confidential pursuant to the Protective Order entered on September 27, 2013 under seal.

A hard-copy of this letter and its attachments will also be hand-delivered to your office.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Tim Birnbaum / em'.

Timothy H. Birnbaum